

**United States Department of the Interior
Bureau of Land Management**

**Determination of NEPA Adequacy
DOI-BLM-UT-Y020-2015-018-DNA**

June 2015

**Grand Canyon Youth, Inc.
Special Recreation Permit**

Location: San Juan River between Montezuma Creek and Clay Hills Crossing, Utah

Applicant/Address: Emma Wharton, Grand Canyon Youth, Inc.
P.O. Box 23376, Flagstaff, AZ 86002

Monticello Field Office
365 N. Main St.
Monticello, Utah 84534
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Worksheet

Determination of NEPA Adequacy

U.S. Department of the Interior
Utah Bureau of Land Management

The signed CONCLUSION at the end of this worksheet is part of an interim step in the BLM's internal analysis process and does not constitute an appealable decision; however, it constitutes an administrative record to be provided as evidence in protest, appeals and legal procedures.

OFFICE: Monticello Field Office

PROJECT NUMBER: DOI-BLM-UT-Y020-2015-018-DNA

PROPOSED ACTION TITLE: Grand Canyon Youth Special Recreation Permit

LOCATION/LEGAL DESCRIPTION: San Juan River between Montezuma Creek and Clay Hills Crossing, Utah

APPLICANT: Emma Wharton, P.O. Box 23376, Flagstaff, AZ 86002

A. Description of the Proposed Action and Any Applicable Mitigation Measures

The BLM Monticello Field Office has proposed to divide the authorized use (50 annual pre-allocated launches) granted under Northern Arizona University's (NAU) current Special Recreation Permit (SRP) and issue a new SRP to Emma Wharton of Grand Canyon Youth, Inc. (GCY) to use a portion of that use. The current NAU SRP and proposed GCY SRP provide authorization to conduct commercial river tours, throughout the year with up to 25 passengers and 8 guides on the San Juan River between Montezuma Creek and Clay Hills Crossing, Utah. The primary season of use is between March 1st and October 31st of each year. The two organizations would divide 50 annual pre-allocated launches, totaling 1250 passenger spaces, to create a separate permit for GCY. GCY has partnered with NAU since 2005 to provide experiential education river trips to youth on the San Juan River. GCY currently operates under the NAU SRP through a license agreement and the two organizations share pre-allocated launch dates on an annual basis. Issuance of a separate SRP to GCY will allow the two entities to operate independently and ensure compliance with BLM SRP General Terms regarding third party assignment, contracting, or subleasing. Since both organizations currently operate on the San Juan River, any changes that would occur to operations due to splitting authorized use and issuing a separate SRP to GCY are minimal. No changes would be made to the permitted area of use, total use allocation and limits, stipulations, or terms and conditions. Existing launch limits and total commercial allocation on the San Juan River will remain the same. The NAU permit is currently in good standing and the criteria for issuance of a new SRP have been met by GCY (43 CFR 2932.24). The new SRP would be valid until 2017 to remain consistent with other river permits issued for the San Juan River. San Juan River Commercial River Stipulations would be attached to the new SRP.

B. Land Use Plan (LUP) Conformance

LUP Name: Monticello Field Office Resource Management Plan (RMP)

Date Approved: November 17, 2008

The proposed action is in conformance with the applicable LUPs because it is specifically provided for in the following LUP decisions:

San Juan River SRMA (pg.95):

- “San Juan River SRMA (pg.95): Provide outstanding river related recreational opportunities and visitor experiences while protecting natural and cultural resource values with integrated management between the BLM, NPS, and the Navajo Nation.”
- “Allow for boating and rafting activities regulated through permit issuance.”

San Juan River SRMA, REC-49 (pg. 95): “Permits will be issued to commercial companies on a five-year designated basis.”

San Juan River SRMA, REC-50 (pg. 95): “River trips on the San Juan River require a special use permit.”

San Juan River SRMA, REC-60 (pg. 96): “Launch limits allow approximately 40,000 user/days per year.”

San Juan River SRMA, REC-61 (pg. 96): “Trip size is limited to 25 people total (including crew) for private trips. Commercial group size limits on the San Juan River will remain at 33 people (25 passengers plus 8 guides) per trip.”

Commercial/Private Allocations (pg. 96): “Commercial use is allowed up to 40% of total use. Two commercial day trips per day (one launch of 25 passengers and one launch of ten passengers) are allowed and are not included in the launch limits.”

C. Identify the applicable National Environmental Policy Act (NEPA) documents and other related documents that cover the proposed action.

Monticello Field Office Resource Management Plan, Final Environmental Impact Statement (EIS), signed November, 2008, as follows:

“San Juan River SRMA, Goals and Objectives (pg. 95): Provide outstanding river related recreational opportunities and visitor experiences while protecting, natural and cultural resource values with integrated management between the BLM, NPS, and the Navajo Nation. Allow for boating and rafting activities regulated through permit issuance.”

D. NEPA Adequacy Criteria

1. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA document(s)? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document(s)? If there are differences, can you explain why they are not substantial?

☒ Yes
☐ No

Documentation of answer and explanation:

Yes; the proposed action is essentially identical to that analyzed in the EIS which addresses the impacts of commercial river tours on river segments within the Monticello Field Office boundary.

2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the new proposed action (or existing proposed action), given current environmental concerns, interests, and resource values?

☒ Yes
☐ No

Documentation of answer and explanation:

Yes; the 2008 Monticello Field Office Resource Management Plan contains analysis of the proposed action. The environmental concerns, interests, resource values, and circumstances have not changed to a degree that warrants broader consideration. The range of alternatives analyzed in the RMP were appropriate and the proposed action is covered by the alternative selected in the Record of Decision and Approved Resource Management Plan.

3. Is existing analysis adequate in light of any new information or circumstances (such as, rangeland health standards assessment; recent endangered species listings, updated list of BLM sensitive species)? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the new proposed action?

☒ Yes
☐ No

Documentation of answer and explanation:

Yes; the existing analysis and conclusions are adequate as there has been no new information or circumstances presented that would substantially change the affected environment and environmental impacts than those addressed in the EIS. It can be reasonably concluded that all new information and circumstances are insignificant with regard to analysis of the proposed action.

4. Are the direct, indirect, and cumulative effects that would result from implementation of the new proposed action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?

☒ Yes
☐ No

Documentation of answer and explanation:

Yes; the direct and indirect impacts are substantially unchanged from those identified in the existing NEPA document. Yes; impacts analyzed in the EIS are the same as those associated with the current proposed action.

5. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?

☒ Yes
☐ No

Yes; there was an extensive amount of public involvement associated with the 2008 Resource Management Plan Environmental Impact Statement. This level of involvement and notification is adequate for the current proposed action.

E. Persons/Agencies/BLM Staff Consulted:

<u>Name</u>	<u>Title</u>	<u>Resource Represented</u>
Nick Walendziak	Recreation Planner	Areas of Critical Environmental Concern; Farmlands, Wild & Scenic Rivers, Environmental Justice
Jeff Brown	Natural Resource Specialist	Wastes (hazardous or solid)
Cameron Cox	Archaeologist	Cultural Resources
Don Simonis	Archaeologist	Native American Religious Concerns
Jed Carling	Range Specialist	Invasive Species/Noxious Weeds; Wetlands/Riparian Zones; Floodplains
Mandy Scott	Wildlife Biologist	Threatened, Endangered, or Candidate Animal Species; Threatened, Endangered, or Candidate Plant Species; Migratory Birds; Fish and Wildlife
Casey Worth	Planning Specialist	Wilderness/WSA and Lands with Wilderness Characteristics
Cliff Giffen	Natural Resource Specialist	Air Quality Greenhouse gas emissions; Soils
Ted McDougall	Geologist	Mineral Resources/Energy Production
Paul Plemons	Fuels Specialist	Fuels/ Fire Management
Rebecca Hunt-Foster	Paleontologist	Paleontological Resources

CONCLUSION

Plan Conformance:

- ☐ This proposal conforms to the applicable land use plan.
- ☐ This proposal does not conform to the applicable land use plan

Determination of NEPA Adequacy

- ☐ Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the NEPA documentation fully covers the proposed action and constitutes BLM's compliance with the requirements of the NEPA.
- ☐ The existing NEPA documentation does not fully cover the proposed action. Additional NEPA documentation is needed if the project is to be further considered.



Signature of Project Lead

6/16/15

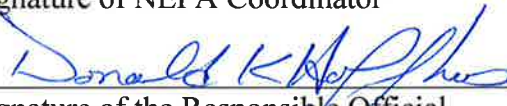
Date

/s/ Brian Quigley

Signature of NEPA Coordinator

6/10/15

Date



Signature of the Responsible Official

6/15/2015

Date

Note: The signed Conclusion on this Worksheet is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision. However, the lease, permit, or other authorization based on this DNA is subject to protest or appeal under 43 CFR Part 4 and the program-specific regulations.

INTERDISCIPLINARY TEAM CHECKLIST

Project Title: Grand Canyon Youth Special Recreation Permit

NEPA Log Number: DOI-BLM-UT-Y020-2015-018-DNA

File/Serial Number: DOI-BLM-UT-Y020-2015-018-DNA

Project Leader: Silas Sparks

Description of the Proposed Action and Any Applicable Mitigation Measures:

The BLM Monticello Field Office has proposed to divide the authorized use (50 annual pre-allocated launches) granted under Northern Arizona University's (NAU) current Special Recreation Permit (SRP) and issue a new SRP to Emma Wharton of Grand Canyon Youth, Inc. (GCY) to use a portion of that use. The current NAU SRP and proposed GCY SRP provide authorization to conduct commercial river tours, throughout the year with up to 25 passengers and 8 guides on the San Juan River between Montezuma Creek and Clay Hills Crossing, Utah. The primary season of use is between March 1st and October 31st of each year. The two organizations would divide 50 annual pre-allocated launches, totaling 1250 passenger spaces, to create a separate permit for GCY. GCY has partnered with NAU since 2005 to provide experiential education river trips to youth on the San Juan River. GCY currently operates under the NAU SRP through a license agreement and the two organizations share pre-allocated launch dates on an annual basis. Issuance of a separate SRP to GCY will allow the two entities to operate independently and ensure compliance with BLM SRP General Terms regarding third party assignment, contracting, or subleasing. Since both organizations currently operate on the San Juan River, any changes that would occur to operations due to splitting authorized use and issuing a separate SRP to GCY are minimal. No changes would be made to the permitted area of use, total use allocation and limits, stipulations, or terms and conditions. Existing launch limits and total commercial allocation on the San Juan River will remain the same. The NAU permit is currently in good standing and the criteria for issuance of a new SRP have been met by GCY (43 CFR 2932.24). The new SRP would be valid until 2017 to remain consistent with other river permits issued for the San Juan River. San Juan River Commercial River Stipulations would be attached to the new SRP.

DETERMINATION OF STAFF: (Choose one of the following abbreviated options for the left column)

NP = not present in the area impacted by the proposed or alternative actions

NI = present, but not affected to a degree that detailed analysis is required

PI = present with potential for relevant impact that need to be analyzed in detail in the EA

NC = (DNAs only) actions and impacts not changed from those disclosed in the existing NEPA documents cited in Section D of the DNA form. The Rationale column may include NI and NP discussions.

The following elements are not present in the Monticello Field Office and have been removed from the checklist:
Farmlands (Prime or Unique), Wild Horses and Burros.

Determination	Resource	Rationale for Determination*	Signature	Date
RESOURCES AND ISSUES CONSIDERED (INCLUDES SUPPLEMENTAL AUTHORITIES APPENDIX 1 H-1790-1)				
NC	Air Quality Greenhouse Gas Emissions	The proposed action is consistent with recreation decisions in the MFO ROD/RMP, 11/2008. Impacts to air quality from recreation decisions were adequately assessed in the MFO ROD/RMP and final EIS, 2008.	CGiffen	06/10/15
NC	Floodplains	Floodplains are present along the San Juan River but were not specifically analyzed in the original document. There would be no impact to floodplains because the proposed activity is a continuation of the current situation, no new surface-disturbing activities would occur, the proposal is a currently permitted and valid use of the river, current floodplain conditions would not be degraded by proposed use, and impacts of recreation decisions to floodplain vegetation (i.e. riparian resources) was previously analyzed in the Final EIS and associated ROD for the 2008 MFO RMP.	Jed Carling	6/2/15
NC	Soils	The proposed action is consistent with recreation decisions in the MFO ROD/RMP, 11/2008. Impacts to soils from recreation decisions were adequately assessed in the MFO ROD/RMP and final EIS, 2008..	CGiffen	6/10/15
NC	Water Resources/Quality (drinking/surface/ground)	The Proposed Action is consistent with recreation decisions in the 2008 MFO RMP/ROD. Impacts to water resources pertaining to recreation activities were adequately addressed. The impacts associated with the Proposed Action have not changed from those analyzed in the 2008 RMP/ROD.	M.Scott	6/2/15
NC	Wetlands/Riparian Zones	Impacts of recreation decisions on riparian resources were analyzed in the 2008 Final Environmental Impact Statement (EIS) for the Monticello Field Office Resource Management Plan (RMP) (see 4.3.11.2.4). This includes the proposed special use permits on the San Juan River for commercial river trips. The proposed action and associated impacts are not changed from those analyzed in the 2008 RMP Final EIS and Record of Decision (ROD). The proposal would not impact riparian resources in a manner beyond what has been disclosed as recreation impacts on riparian resources in the final 2008 MFO ROD/RMP/EIS	Jed Carling	6/2/15
NC	Areas of Critical Environmental Concern	The proposed action is consistent with the San Juan River ACEC decisions in the MFO ROD/RMP, 11/2008 which allow for the issuance of commercial SRPs in accordance with the recreation section of the RMP. Impacts to ACECs from recreation decisions were adequately analyzed in the MFO ROD/RMP, 11/2008.	N. Walendziak	6/2/15
NC	Recreation	The proposed action is consistent with the San Juan River SRMA recreation decisions in the MFO ROD/RMP, 11/2008. The Special Recreation Permit issuance would result in no changes to existing allocation levels or commercial use stipulations.	N. Walendziak	6/2/15
NC	Wild and Scenic Rivers	There would be no change from the impacts analyzed in the MFO ROD/RMP, 11/2008.	N. Walendziak	6/2/15
NC	Visual Resources	There would be no change from the impacts analyzed in the MFO ROD/RMP/EIS 11/2008.	N. Walendziak	6/2/15
NC	BLM Natural Areas	The proposed action is consistent with the impacts analyzed in the MFO ROD/RMP and EIS of 2008 and would result in no changes to existing allocation levels or commercial use stipulations.	N. Walendziak	6/2/15

Determination	Resource	Rationale for Determination*	Signature	Date
NC	Socio-Economics	The proposed action would result in no change from the impacts to Socio-Economics analyzed in the MFO ROD/RMP and EIS 2008.	S. Sparks	6/2/15
NC	Wilderness/WSA Lands with Wilderness Characteristics	The proposed action is consistent with the San Juan River SRMA recreation decisions which were adequately analyzed in the MFO ROD/RMP and EIS of 2008. The Special Recreation Permit issuance would result in no changes to existing allocation levels or commercial use stipulations and the associated impacts to Lands with Wilderness Characteristics.	N. Walendziak	6/2/15
NC	Cultural Resources	The proposed action would result in no change from the impacts to Cultural Resources analyzed in the MFO ROD/RMP and EIS 2008.	C. Cox	6/2/15
NC	Native American Religious Concerns	The proposed action would result in no change from the impacts to Cultural Resources analyzed in the MFO ROD/RMP and EIS 2008. The Tribes have not identified any new concerns for this area.	C. Cox	6/2/15
NC	Environmental Justice	The proposed action would result in no change from the impacts to Environmental Justice analyzed in the MFO ROD/RMP/EIS 11/2008.	S. Sparks	6/2/15
NC	Wastes (hazardous or solid)	Standard permit stipulations provide adequate mitigation to prevent impacts from wastes.	J. Brown	6/3/15
NC	Threatened, Endangered or Candidate Animal Species	The Proposed Action is consistent with recreation decisions in the 2008 MFO RMP/ROD. Impacts to threatened endangered and candidate wildlife resources pertaining to recreation activities were adequately addressed. The impacts associated with the Proposed Action have not changed from those analyzed in the 2008 RMP/ROD.	M. Scott	6/2/15
NC	Migratory Birds	The Proposed Action is consistent with recreation decisions in the 2008 MFO RMP/ROD. Impacts to migratory birds pertaining to recreation activities were adequately addressed. The impacts associated with the Proposed Action have not changed from those analyzed in the 2008 RMP/ROD.	M. Scott	6/2/15
NC	Utah BLM Sensitive Species	The Proposed Action is consistent with recreation decisions in the 2008 MFO RMP/ROD. Impacts to Utah BLM Sensitive Species pertaining to recreation activities were adequately addressed. The impacts associated with the Proposed Action have not changed from those analyzed in the 2008 RMP/ROD.	M. Scott	6/2/15
NC	Fish and Wildlife Excluding USFW Designated Species	The Proposed Action is consistent with recreation decisions in the 2008 MFO RMP/ROD. Impacts to wildlife resources pertaining to recreation activities were adequately addressed. The impacts associated with the Proposed Action have not changed from those analyzed in the 2008 RMP/ROD.	M. Scott	6/2/15
NC	Invasive Species/Noxious Weeds	Impacts of recreation decisions on vegetation resources, including invasive / weeds, were analyzed in the 2008 Final Environmental Impact Statement (EIS) for the Monticello Field Office Resource Management Plan (RMP) (see 4.3.17.2.8). The proposed action and associated impacts are not changed from those analyzed in the 2008 RMP Final EIS and Record of Decision (ROD). The proposal would not impact invasive species / noxious weeds in a manner beyond what has been disclosed as recreation impacts on vegetation resources in the final 2008 MFO ROD/RMP/EIS.	Jed Carling	6/2/15
NC	Threatened, Endangered or Candidate Plant	The proposed action would result in no change from the impacts to Threatened, Endangered or Candidate Plant	M. Scott	6/2/15

Determination	Resource	Rationale for Determination*	Signature	Date
	Species	Species analyzed in the 2008 MFO ROD/RMP.		
NC	Livestock Grazing	<p>Impacts of recreation decisions on livestock grazing were analyzed in the 2008 Final Environmental Impact Statement (EIS) for the Monticello Field Office Resource Management Plan (RMP) (see 4.3.6.3.5).</p> <p>The proposed action and associated impacts are not changed from those analyzed in the 2008 RMP Final EIS and Record of Decision (ROD). The proposal would not impact livestock grazing in a manner beyond what has been disclosed as recreation impacts on livestock grazing in the final 2008 MFO ROD/RMP/EIS.</p>	Jed Carling	6/2/15
NC	Rangeland Health Standards	<p>Utah Standards for Rangeland Health (Soils, Riparian, Desired Species, and Water Quality) were individually analyzed for impacts from recreation decisions in the 2008 Final Environmental Impact Statement (EIS) for the Monticello Field Office Resource Management Plan (RMP)</p> <p>The proposed action and associated impacts are not changed from those analyzed in the 2008 RMP Final EIS and Record of Decision (ROD). The proposal would not impact rangeland health in a manner beyond what has been disclosed in the final 2008 MFO ROD/RMP/EIS.</p>	Jed Carling	6/2/15
NC	Vegetation Excluding USFW Designated Species	<p>Impacts of recreation decisions on vegetation resources were analyzed in the 2008 Final Environmental Impact Statement (EIS) for the Monticello Field Office Resource Management Plan (RMP) (see 4.3.17.2.8).</p> <p>The proposed action and associated impacts are not changed from those analyzed in the 2008 RMP Final EIS and Record of Decision (ROD). The proposal would not impact vegetation in a manner beyond what has been disclosed as recreation impacts on vegetation resources in the final 2008 MFO ROD/RMP/EIS.</p>	Jed Carling	6/2/15
NC	Woodland / Forestry	<p>The proposed action and associated impacts are not changed from those disclosed in the existing EA. The area of the proposed disturbance does not contain any substantive woodland products or forestry materials and is unavailable for woodland product use except for limited onsite collection of dead and drift wood for campfires, which is stipulated in the use permit.</p>	M. Scott	6/2/15
NI	Fuels/Fire Management	<p>The proposed action will not interfere with future fuels projects. Fire suppression efforts will not be hampered by the issuance of a new river SRP.</p>	P.Plemons	6/2/15
NC	Mineral Resources/Energy Production	<p>Impacts of recreation decisions on mineral resource development were analyzed in the 2008 Final Environmental Impact Statement (EIS) for the Monticello Field Office Resource Management Plan (RMP) (see 4.3.7.4 and 4.3.7.4.3).</p> <p>The proposed action and associated impacts are not changed from those analyzed in the 2008 RMP Final EIS and Record of Decision (ROD). The proposal would not impact mineral development in a manner beyond what has been disclosed in the final 2008 MFO ROD/RMP/EIS.</p>	T.McDougall	6/4/2015
NC	Lands/Access	<p>This proposal does not have any changes in visitor use and will not have any impacts on activities of the Lands and Reality program beyond what has been disclosed in the final 2008 MFO ROD/RMP/EIS.</p>	Chris Ransel	6/3/2015

Determination	Resource	Rationale for Determination*	Signature	Date
NC	Paleontology	The proposed action would result in no change from the impacts to Paleontological Resources analyzed in the MFO ROD/RMP and EIS 2008.	R. Hunt-Foster	6/3/2015

FINAL REVIEW:

Reviewer Title	Signature	Date	Comments
Environmental Coordinator	<i>/s/ Brian T. Quigley</i>	6/10/15	
Authorized Officer	<i>/s/ Donald K. Hoffheins</i>	6/15/2015	